

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Debtor.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

FAIRFIELD SENTRY LIMITED, et al.,

Defendants.

Adv. Pro. No. 09-01239 (SMB)

**STIPULATION EXTENDING TIME TO MOVE,
ANSWER OR OTHERWISE RESPOND TO TRUSTEE'S
COMPLAINT AND ADJOURNING THE PRE-TRIAL CONFERENCE**

WHEREAS, Irving H. Picard, Trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff (the "Trustee") commenced the above-captioned adversary proceeding (the "Adversary Proceeding") against Fairfield Sentry Limited, Greenwich Sentry, L.P., and Greenwich Sentry Partners, L.P. on May 16, 2009; and

WHEREAS, on July 20, 2010, the Trustee filed an Amended Complaint against defendants Fairfield Sentry Limited, Greenwich Sentry, L.P., Greenwich Sentry Partners, L.P., Fairfield Sigma Limited, Fairfield Lambda Limited, Chester Global Strategy Fund Limited, Chester Global Strategy Fund, Irongate Global Strategy Fund Limited, Fairfield Greenwich Fund (Luxembourg), Fairfield Investment Fund Limited, Fairfield Investors (Euro) Limited, Fairfield Investors (Swiss Franc) Limited, Fairfield Investors (Yen) Limited, Fairfield Investment Trust,

FIF Advanced, Ltd., Sentry Select Limited, Stable Fund, Fairfield Greenwich Limited, Fairfield Greenwich (Bermuda), Ltd., Fairfield Greenwich Advisors LLC, Fairfield Greenwich GP, LLC, Fairfield Greenwich Partners, LLC, Fairfield Heathcliff Capital LLC, Fairfield International Managers, Inc., Fairfield Greenwich (UK) Limited, Greenwich Bermuda Limited, Chester Management Cayman Limited, Walter Noel, Jeffrey Tucker, Andrés Piedrahita, Corina Noel Piedrahita, Mark McKeefry, Daniel Lipton, Amit Vijayvergiya, Gordon McKenzie, Richard Landsberger, Philip Toub, Charles Murphy, Robert Blum, Andrew Smith, Harold Greisman, Gregory Bowes, Lourdes Barreneche, Cornelis Boele, Santiago Reyes, Jacqueline Harary (the “Amended Complaint”); and

WHEREAS, the Trustee effected service of the Amended Summons and Amended Complaint on defendants Fairfield Sentry Limited, Fairfield Sigma Limited, Fairfield Lambda Limited, Greenwich Sentry, L.P., and Greenwich Sentry Partners, L.P. and subsequently settled his claims with Fairfield Sentry Limited, Fairfield Sigma Limited, Fairfield Lambda Limited, Greenwich Sentry, L.P., and Greenwich Sentry Partners, L.P. and consent judgments have been entered as against them; and

WHEREAS, the Trustee filed notices of dismissal with prejudice as against Chester Global Strategy Fund Limited, Chester Global Strategy Fund, L.P., and Irongate Global Strategy Fund Limited; and

WHEREAS, the Trustee filed notices of dismissal without prejudice as against Fairfield Greenwich GP, LLC, Sentry Select Limited, Fairfield Greenwich Partners LLC, Greenwich Bermuda Limited, Fairfield Heathcliff Capital LLC, Fairfield Greenwich (UK) Limited, Fairfield Investors (Yen) Limited, Fairfield Investors (Swiss Franc) Limited, Fairfield Investment Trust, FIF Advanced, Ltd., and Chester Management Cayman Limited; and

WHEREAS, the Trustee filed a notice of dismissal with prejudice as against Fairfield Greenwich Fund (Luxembourg); and

WHEREAS, the Trustee has effected service of the Amended Summons and Amended Complaint on defendants Amit Vijayvergiya, Stable Fund LP, Cornelis Boele, Fairfield Greenwich Limited, Fairfield Greenwich (Bermuda) Limited, Fairfield Greenwich Advisors LLC, Fairfield International Managers, Inc., Fairfield Investment Fund Limited, Fairfield Investors (Euro) Limited, Mark McKeefry, Daniel Lipton, Gordon McKenzie, Richard Landsberger, Philip Toub, Charles Murphy, Andrew Smith, Harold Greisman, Lourdes Barreneche, Santiago Reyes, Jacqueline Harary, Corina Noel Piedrahita, Andres Piedrahita, Walter Noel, Gregory Bowes, Jeffrey Tucker, and Robert Blum (collectively, the “Stipulation Defendants”); and

WHEREAS, the Stipulation Defendants have requested an extension of time to move, answer or otherwise respond to the Amended Complaint and continue the date of the pre-trial conference.

NOW, THEREFORE, it is stipulated and agreed by and between the Trustee and the Stipulation Defendants as follows:

1. The time by which the Stipulation Defendants may move, answer or otherwise respond to the Amended Complaint is further extended from April 30, 2014, up to, and including **June 30, 2014**.
2. The pre-trial conference previously scheduled for July 30, 2014 at 10:00 a.m. shall be adjourned to **August 27, 2014 at 10:00 a.m.**
3. All times set forth in this Stipulation to move, answer or otherwise respond to the Amended Complaint shall be subject to and superseded by any applicable court order providing for a later response date.

4. The parties to this Stipulation reserve all rights and defenses they may have, and entry into this stipulation shall not impair or otherwise affect any such rights and defenses, including challenges to personal jurisdiction, or the jurisdiction of this Court or any other Court.

5. This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original. This Stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (Adv. Pro. No. 08-01789 (SMB), Dkt. No. 5600).

Dated: New York, NY
April 15, 2014

/s/ Thomas L. Long
Baker & Hostetler LLP
45 Rockefeller Plaza
New York, New York 10111
Telephone (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Thomas L. Long
Email: tlong@bakerlaw.com
Marc E. Hirschfield
Email: mhirschfield@bakerlaw.com
*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff
Investment Securities LLC and
the estate of Bernard L. Madoff*

Date: New York, NY
April 15, 2014

/s/ Frederick R. Kessler
Wollmuth Maher & Deutsch LLP
500 Fifth Avenue
New York, New York 10022
Telephone: 212-382-3300
William A. Maher
Email: wmaher@wmd-law.com
Frederick R. Kessler
Email: fkessler@wmd-law.com
*Counsel to Defendants Fairfield Investment
Fund Limited, Fairfield Investors (Euro)
Limited, and Stable Fund LP*

Date: New York, NY
April 15, 2014

/s/ Sean F. O'Shea
O'Shea Partners LLP
521 Fifth Avenue, 25th Floor
New York, NY 10175
Telephone: 212-682-4426
Sean F. O'Shea
Email: soshea@osheapartners.com
Michael E. Petrella
Email: mpetrella@osheapartners.com
Counsel to Defendant Cornelis Boele

Dated: New York, NY
April 15, 2014

/s/ Mark G. Cunha
Simpson Thacher & Bartlett LLP
425 Lexington Avenue
New York, NY 10017
Telephone: 212-455-2000
Mark G. Cunha
Email: mcunha@stblaw.com
Peter E. Kazanoff
Email: pkazanoff@stblaw.com
Counsel to Defendants Fairfield Greenwich Limited, Fairfield Greenwich (Bermuda) Limited, Fairfield Greenwich Advisors LLC, Fairfield International Managers, Inc., Mark McKeefry, Daniel Lipton, Amit Vijayvergiya, Gordon McKenzie, Richard Landsberger, Philip Toub, Charles Murphy, Andrew Smith, Harold Greisman, Lourdes Barreneche, Santiago Reyes, Jacqueline Harary, and Corina Noel Piedrahita

Dated: New York, NY
April 15, 2014

/s/ Andrew W. Hammond
White & Case LLP
1155 Avenue of the Americas
New York, NY 10036-2787
Telephone: 212-819-8200
Glenn M. Kurtz
Email: gkurtz@whitecase.com
Andrew W. Hammond
Email: ahammond@whitecase.com
Counsel to Defendant Walter Noel

Dated: Washington, DC
April 15, 2014

/s/ Bruce A. Baird
Covington & Burling LLP
1201 Pennsylvania Ave, NW
Washington, DC 20004-2401
Telephone: 202-662-6000
Bruce A. Baird
Email: bbaird@cov.com
Counsel to Defendant Gregory Bowes

Dated: New York, NY
April 15, 2014

/s/ Daniel J. Fetterman
Kasowitz, Benson, Torres & Friedman LLP
1301 Avenue of the Americas
New York, NY 10019
Telephone: 212-506-1700
Marc E. Kasowitz
Email: mkasowitz@kasowitz.com
Daniel J. Fetterman
Email: dfetterman@kasowitz.com
Counsel to Defendant Jeffrey Tucker

Dated: New York, NY
April 15, 2014

/s/ Edward M. Spiro
Morvillo Abramowitz Grand Iason &
Anello P.C.
565 Fifth Avenue
New York, NY 10017
Telephone: 212-856-9600
Edward M. Spiro
Email: espiro@maglaw.com
Counsel to Defendant Robert Blum

Dated: New York, NY
April 15, 2014

/s/ Andrew J. Levander
Dechert LLP
1095 Avenue of the Americas
New York, NY 10036
Telephone: 212-698-3500
Andrew J. Levander
Email: andrew.levander@dechert.com
Counsel to Defendant Andres Piedrahita